

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>In re:</b>	)	<b>Case No.: 23-43817</b>
	)	
<b>MATTRESS DIRECT, Inc ,</b>	)	<b>Honorable Bonnie L. Clair</b>
	)	<b>Chapter 11 Proceeding</b>
<b>Debtor.</b>	)	
	)	
<b>In re:</b>	)	<b>Case No.: 23-43819</b>
	)	
<b>CAMPBELL SLEEP, LLC.,</b>	)	<b>Honorable Bonnie L. Clair</b>
	)	<b>Chapter 11 Proceeding</b>
<b>Debtor.</b>	)	
	)	
<b>In re:</b>	)	<b>Case No.: 23-43821</b>
	)	
<b>DELIVERPRO, LLC,</b>	)	<b>Honorable Bonnie L. Clair</b>
	)	<b>Chapter 11 Proceeding</b>
<b>Debtor.</b>	)	
	)	

**MOTION OF DEBTORS FOR ENTRY OF AN ORDER  
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

COMES NOW DeliverPRO, LLC, Mattress Direct, Inc. and Campbell Sleep, LLC (the “**Debtors**”), by and through the undersigned counsel, and for their Motion for Joint Administration of Cases (the “**Motion**”) state to the Court as follows:

**BACKGROUND**

1. On the date hereof (the “Petition Date”), the Debtors each commenced with this Court a voluntary case under title 11 of the United States Code (the “Bankruptcy Code”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these chapter 11 cases. The Debtors have also filed a motion requesting joint administration of their chapter 11 cases pursuant to Rule

1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1015(b) of the Local Rules of Bankruptcy Procedure for the Eastern District of Missouri (the “Local Rules”).

**Jurisdiction**

2. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Since the Petition Date, the Debtors have maintained possession of their assets as debtors in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

**RELIEF REQUESTED**

4. By this Motion, the Debtors seek entry of an order (the “Proposed Order”), pursuant to sections 105(a) and 342(c)(1) of the Bankruptcy Code, Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1015(b) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Missouri (the “Local Rules”), for authority for joint administration of their chapter 11 cases for procedural purposes only. In addition, the Debtors respectfully request that the Court maintain one file and one docket for all of the jointly administered cases under the same number assigned to Mattress Direct, Inc. and that these chapter 11 cases be jointly administered under the following consolidated caption:

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b>	<b>)</b>	<b>Chapter 11 Proceeding</b>
	<b>)</b>	<b>Honorable Bonnie L. Clair</b>
	<b>)</b>	
<b>MATTRESS DIRECT, INC.,</b>	<b>)</b>	<b>Case No. 23-43817</b>

**CAMPBELL SLEEP, LLC, and  
DELIVERPRO, LLC,  
Debtors.**

5. The Debtors also seek this Court's direction that a notation substantially similar to the following be entered on the docket in each of the above-captioned cases to reflect the joint administration of these cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of DeliverPRO, LLC, Mattress Direct, Inc. and Campbell Sleep, LLC. The docket in Case No. 23-43817 should be consulted for all matters affecting this case.

## **Relief Requested Should be Granted**

6. Given the fact that the Debtors share common ownership and Debtors Mattress Direct, Inc. and Campbell Sleep, LLC share primary secured creditors, the procedural burdens that might be placed upon the Debtors and other creditors to file multiple pleadings in each of these Cases warrant their joint administration.

7. The joint administration of the Cases, including the combining of notices to creditors of the respective estates, as well as calling and hearing all matters at the same time, will promote economical, efficient and convenient administration of the estates. The rights of the respective creditors of each of the estates will not be adversely affected by the joint administration since the relief sought is purely procedural and is in no way intended to affect substantive rights. Each creditor will be entitled to file a proof of claim against a particular estate if a proof of claim is required.

8. Finally, supervision of the administrative aspects of the Cases by the Office of the United States Trustee will be simplified. No substantive consolidation is sought by this Motion.

9. No administrative or scheduling orders previously entered in the Cases will require modification if this Motion is granted. Mailing lists in each of the Cases will be consolidated for future noticing requirements.

**NOTICE**

10. Notice of this Motion has been given to: (a) the United States Trustee; (b) all creditors and parties in interest.

11. The Debtors submit that the notice provided is adequate in light of the relief requested.

WHEREFORE, the Debtors respectfully request that this Court enter an order providing for the joint administration of the Cases for procedural purposes and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

DeliverPRO, LLC, Campbell Sleep, LLC and Mattress Direct, Inc.,

CARMODY MACDONALD P.C.

By: /s/ Thomas H. Riske

Thomas H. Riske, #61838MO  
Nathan R. Wallace #74890MO  
120 S. Central Avenue, Suite  
1800 St. Louis, Missouri 63105  
(314) 854-8600  
(314) 854-8660 – FAX  
[thr@carmodymacdonald.com](mailto:thr@carmodymacdonald.com)

Proposed Attorneys for DeliverPRO, LLC, Campbell Sleep, and Mattress Direct, Inc.